SECTION VII. HANDLING AND CONTROL OF CLASSIFIED COMSEC MATERIAL DURING DEVELOPMENT AND MANUFACTURE/ASSEMBLY

57. General. The security of classified COMSEC material generated by a contractor is dependent upon adequate controls from inception of the material through eventual destruction. While the CMCS provides the desired degree of control over the finished COMSEC material after it has been accepted by the Government, the procedures would entail a prohibitive amount of paperwork if applied to classified COMSEC material in the various stages of fabrication within a contractor facility or when transmitted between a prime contractor and subcontractor. In lieu of entering such in-production material into the formal CMCS, contractors engaged in COMSEC contracts will control the material under internal in-process accounting, leaving the methods and details to the discretion of each contractor. Where the contract requires the production of TOP SECRET keying material, the mandated no-lone zone controls must be implemented and addressed in the in-process procedures. Prior to commencing fabrication of classified COMSEC material, the contractor must prepare written in-process accounting procedures to be employed to support a particular classified contract. If the procedure applies to more than one contract, it will so state. The written procedure will clearly establish the point in the production process when the item becomes classified and subject to in-process accounting. The procedure will provide specific instructions for the method of control, the proper records to be maintained, and instructions for the reconciliation of in-process accounting records (see Paragraph 58), and the maintenance of the Master Disposition Record (see Paragraph 49b). The in-process accounting procedure will also stipulate the individuals or department responsible for ensuring that the required records are maintained and that the requirements stated in the procedure are followed. NSA will assist contractors in identifying the point in the production process when an item becomes classified and, if requested, will provide a sample procedure which may be used as a guide in the preparation of their in-process accounting procedure. Ninety days prior to start of production and implementation of the procedures, a draft procedure will be forwarded to the NSA COR through the Contracting Officer for approval. Likewise, if the contractor decides, due to changes in the production process, to revise the procedure, the revision must again be submitted to the NSA COR for approval prior to implementing any changes. The contractor should note that the-fabrication process cannot-begin until this procedure has been approved by the NSA COR.

58. Requirements.

a. Within a Facility, in-process accounting procedures will include the following information for each end item of COMSEC material from the point the material reaches a classified stage and is subject to in-process controls:

(1) Date introduced into the in-process accounting systems within the facility.

(2) A brief unclassified description of the items to be controlled. This may be one or a combination of the following:

(a) Federal Stock Number

(b) NSA or Contractor Part Number

(c) TSEC Short Title.

(3) Quantity

(4) Serial or Control Number. (NOTE: While quantitative accounting is acceptable, the contractor may elect to maintain accountability by serial or control number).

(5) A detailed explanation of the production process and the control points and types of records to be maintained which will reflect an accurate count of classified items in a particular production process at any given time.

(6) Disposition: For example:

(a) Incorporated in or otherwise made a part of another item of classified material.

(b) Entered into the CMCS as an individual accountable item.

(c) Destroyed or declassified.

(d) Returned to a subcontractor for rework or returned to the prime contractor after rework.

(e) Any other disposition not covered in (a) through (d), above.

b. Integrated Circuits (IC's). Rigid accountability of IC's and associated manufacturing aids; e.g., retitles, masks, masters, test samples, pattern generation tapes, etc., will be accomplished in accordance with the following criteria:

(1) Individual classified wafers, masks, retitles, masters, test samples, pattern generation tapes, etc., are accountable and must be controlled on a continuous receipt system from one manufacturing process to another and from one company to another. Each facility will maintain a control record to show the receipt or fabrication of a classified item and the disposition of such items to provide for an audit trail in each stage of fabrication. Lots, runs, etc., of classified material will be accompanied by a record which shows the description and quantity of the material, and bears the signature(s) of responsible person(s); e.g., shift chief, team leader production supervisor, etc.

(2) Less than full wafers (fragmented, cut) will be controlled as individual dies in accordance with Paragraph 58b(1), unless wafers are reconstructed on an

adhesive base. In this case, accountability resumes by wafer count and the records which show the number of dies removed. Contractors will attempt to determine the number of possible full dies in a wafer prior to dicing the wafer. If this cannot be accomplished, the number of full die must be established immediately after dicing the wafers. Less than a full die will be considered as classified scrap and controlled accordingly. The practice of sealing classified scrap in an envelope has proved to be an effective method for controlling the material.

(3) Any area in which the breakage of a classified wafer has occurred must be immediately safeguarded. Every effort must be made to reconstruct the broken wafer onto an adhesive base. If any chip or portion thereof cannot be accounted for, an insecurity report must be made as prescribed in Section XVI. If, however, the missing portion or the entire wafer has fragmented to such a degree that reconstruction is impossible, all particles will be removed from the breakage area by vacuuming. Once the area has been vacuumed, the bag will be marked with the wafer number or, where applicable, with the identification of the chip or portion thereof belonging to the wafer number, and its classification. The vacuum cleaner bag will be controlled as classified COMSEC material until its contents can be transported to NSA for destruction or destroyed locally by an NSA-approved destruction method., Other normally occurring waste (e.g., failures, partial die, etc.) which leave the manufacturing and assembly process shall also be controlled until approved destruction can be accomplished. These failures or breakages will be reflected in the in-process accounting records.

c. Destruction. Destruction of COMSEC equipment (including ICs and associated retitles, masks, masters, test samples, etc.) shall not be performed by the contractor unless the method or device to be used is approved by NSA. Contractors must ensure that the destruction methods selected meet Occupational Safety and Health Administration (OSHA) standards. When COMSEC material is to be destroyed by the contractor, it must be turned over to the COMSEC Custodian or Facility Security Officer. The responsible recipient will maintain a record of the material received for destruction and, when the material is destroyed, he/she shall prepare a local destruction record. The destruction of classified in-process accounting material must be performed by two appropriately cleared individuals. When material is to be forwarded to NSA for destruction, the material may be sent by the Facility Security Officer or the COMSEC Custodian via DCS to the National Security Agency, ATTN: Account 880099, Fort George G. Meade, MD 20755-6000, marked for destruction. This material must be forwarded, using a COMSEC Material Report (SF-153) with an in-process control number assigned (NOTE: Do not use a COMSEC account transaction number). COMSEC material sent for destruction should be identified by TSEC nomenclature, or part number when a nomenclature has not been assigned. When the contractor decides to send material to NSA for destruction, the following accounting and packaging procedures must be followed:

(1) All like items will be packaged in the same container, i.e., all retitles in one package, wafers in another, and ICS in another, etc.

(2) The container will be sealed.